



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII

999 18th STREET - SUITE 500

DEC -6 1990 DENVER, COLORADO 80202-2405

Ref: 8HWM-FF

Mr. Robert M. Nelson, Jr., Manager
Department of Energy
Rocky Flats Area Office
P.O. Box 928
Golden, CO 80402-0928

Re: Final Phase III RFI/RI
Workplan for OU 1

Dear Mr. Nelson:

Through this letter, EPA provides conditional approval of the Final Phase III RFI/RI Workplan (the workplan) for OU 1. Our approval is conditional upon the workplan being coordinated with the Site-wide Quality Assurance Project Plan (QAPjP) and Sitewide Standard Operating Procedures (SOP) when approved by EPA, so as to prevent development of a fatally flawed Phase III Remedial Investigation Report for OU 1. Although the approval is conditional upon the EPA approved integration of the workplan and the QAPjP and SOP, EPA also believes there are numerous areas within the workplan that could be improved as evidenced by the volume of our attached comments.

DOE must realize that this is the third, and supposed final Remedial Investigation for OU 1. EPA, DOE and the State of Colorado have negotiated dates for all aspects of the final response action at OU 1, and Implementation of a flawed Phase III RFI/RI Workplan for OU 1 could jeopardize the finalization of the Remedial Investigation, Risk Assessment, Feasibility Study, and ultimately the Record of Decision. DOE must also recognize that workplans in conjunction with the QAPjP, SOP and Health and Safety Plans are intended to be useful, consummate field documents, directing work, and defining procedures and protocols, and are not just submittals forwarded to meet a scheduled deadline within the Interagency Agreement. As such, EPA has attached extensive comments pertaining to the Final Phase III RFI/RI Workplan in order to provide DOE with direction needed to deliver an investigation which will characterize the nature and extent of contamination at OU 1, characterize the risk to human health and the environment, and ultimately support the cleanup decision at OU 1. Many of the attached comments, without resolution, are likely to impact EPA approval of the Remedial Investigation Report and the Record of Decision for OU 1.

ADMIN RECORD

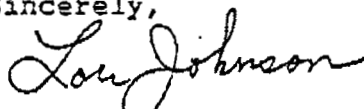
A-OU01-000220

The fact that EPA still has so many comments on a final document, further emphasizes the need to establish scoping meetings and routine monthly meetings to discuss temporal issues and status. EPA is also concerned about the exclusion of the public in developing and approving workplans. The concept of involving the public during development of workplans and prior to approval of workplans was agreed upon during renegotiation of the Interagency Agreement and was included in the response to public comment. EPA sent DOE a letter formally requesting initiation of this process on October 15, 1990. EPA has not received a response to this letter, nor has this process been implemented.

While awaiting approval of the QAPjP and SOP, and the necessary OU 1 workplan and QAPjP/SOP integration, it is EPA's position that this workplan should also be corrected with respect to all issues and comments presented as attached. These corrections can occur in advance of the field work start date for OU 1 and should not affect the field work start date, as the field work start date is over three months away. This position is predicated on a sincere concern and desire that this Remedial Investigation for OU 1 be the last, and that it adequately support a final decision.

EPA is willing to meet with DOE to discuss these comments and to discern an approach that will accommodate both the present field work start date and our concerns. If you should have any further questions or wish to schedule a meeting to discuss these comments and an approach to address our concerns, please contact Martin Hestmark at (303) 294-1134 or Patricia Corbetta at (303) 294-1135.

Sincerely,



Louis W. Johnson, Chief
Federal Facilities Remedial Branch

Attachment

cc with Attachment:

Frazer Lockhart, DOE
Tom Olsen, DOE
Tom Greengard, EG&G
Gary Baughman, CDH
Joe Palomba, CDH-RFPU
Patricia Corbetta, EPA
Martin Hestmark, EPA
Peter Ornstein, EPA